

EXHIBIT G

From: Andrew S. Bruns <abruns@keker.com>
Sent: Monday, July 25, 2022 12:10 PM
To: Dan McGonagle; mybarra@keker.com; anant.saraswat@wolfgreenfield.com; Singular
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com;
mkwun@kblfirm.com; abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)
Attachments: Singular v. Google - RFP 115 Links.xlsx

Counsel,

In response to your inquiry regarding RFP 115, please see the attached spreadsheet. As indicated in the spreadsheet, RFP 115 sought the production of documents referenced in 11 documents previously produced by Google. During fact discovery, Google produced 324 documents in response to this RFP. The columns in the attached spreadsheet reflect the following:

- Col. A: Reference letter corresponding to the list of documents requested in RFP 115;
- Col. B: Bates number associated with the list of docs requested in RFP 115;
- Col. C: The hyperlink text in the document; and
- Col. D: The Bates number of the document(s) found at the hyperlinked text and previously produced by Google during fact discovery.

Entries in column D reflecting "N/A" indicate dead links, links to public websites, or links to non-responsive content (e.g., source code or previously collected ESI that did not hit on applicable search terms); documents at those links were therefore not produced by Google.

Best,
Andy

Andrew S. Bruns

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Pronouns: he, him, his

From: McGonagle, Dan <dmcgonagle@princelobel.com>
Sent: Monday, July 25, 2022 7:28 AM
To: Michelle Ybarra <MYbarra@keker.com>; Andrew S. Bruns <ABruns@keker.com>;
anant.saraswat@wolfgreenfield.com; singular@princelobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com;
abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

[EXTERNAL]

Michelle,

When we conferred on this issue, you indicated that this process would take until the end of June to complete. We followed up at that time, to which you indicated that this process was taking longer than you anticipated and that it would be completed by the week of the 11th. It is now the end of July and we have seen no further supplement from you.

We will remind you that the Request No 115 asked for documents cited within only 11 documents. At the time we served this request, your team was undoubtedly forced to compile the exact information that we are asking for today.

We therefore ask for an update today so that we can assess whether or not this issue warrants involvement of the Court.

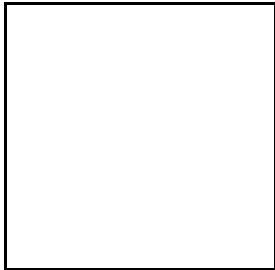
Thanks,

Dan McGonagle



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dmcgonagle@princelobel.com



From: Michelle Ybarra <mybarra@keker.com>

Sent: Thursday, July 7, 2022 6:03 PM

To: McGonagle, Dan <DMcGonagle@princelobel.com>; abruns@keker.com; anant.saraswat@wolfgreenfield.com; Singular <Singular@princelobel.com>

Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com; matthiaskamber@paulhastings.com

Subject: RE: Singular v. Google (-1251)

Dan,

We've been working diligently and in good faith to identify and collect the metadata that Singular has requested. However, we did not promise to produce by a date-certain, including because the metadata can only be gathered via a time-intensive, manual process that is particularly burdensome given the number of links at issue. That process is not yet complete and is taking longer than expected. We are continuing to work on this and are aiming to complete the process next week.

Thanks,

Michelle Ybarra
Keker Van Nest & Peters

From: McGonagle, Dan <dmcgonagle@princelobel.com>
Sent: Thursday, July 7, 2022 7:07 AM
To: Michelle Ybarra <MYbarra@keker.com>; Andrew S. Bruns <ABruns@keker.com>;
anant.saraswat@wolfgreenfield.com; singular@princelobel.com
Cc: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com;
abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

[EXTERNAL]

Michelle,
During our last meet and confer you indicated that Google would be producing metadata that allows Singular to correlate the documents produced pursuant to Request No. 115 with their respective hyperlinks. You promised that supplement would be made by the end of June. Having seen no further supplementation, we write to follow up on this. If you could provide an update today, that would be appreciated.

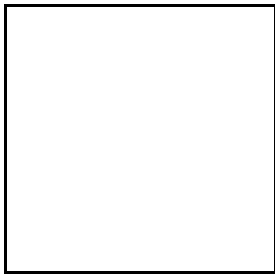
Thanks,

Dan McGonagle



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From: McGonagle, Dan
Sent: Thursday, June 9, 2022 12:19 PM
To: Michelle Ybarra <mybarra@keker.com>; abruns@keker.com; anant.saraswat@wolfgreenfield.com; Singular
<Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com;
matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

Michelle,
That works for us. I will send an invitation.

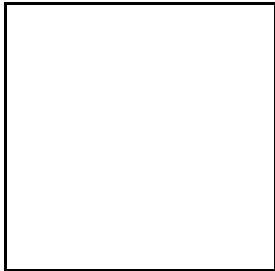
Thanks,

Dan McGonagle



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From: Michelle Ybarra <mybarra@keker.com>
Sent: Thursday, June 9, 2022 11:23 AM
To: McGonagle, Dan <DMcGonagle@princelobel.com>; abruns@keker.com; anant.saraswat@wolfgreenfield.com; Singular <Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

Dan,

We are available to meet and confer tomorrow between 11am-12pm Pacific. If that works for Singular, please circulate a dial-in.

Thanks,

Michelle Ybarra
Keker Van Nest & Peters

From: McGonagle, Dan <dmcgonagle@princelobel.com>
Sent: Tuesday, June 7, 2022 12:59 PM
To: Andrew S. Bruns <ABruns@keker.com>; anant.saraswat@wolfgreenfield.com; singular@princelobel.com
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

[EXTERNAL]

Counsel,

Please provide a time tomorrow when you are available for a meet and confer to discuss the following items:

- Your designation of documents in response to Request for Production No. 115, and
- Singular's request for printouts of source code (correspondence attached).

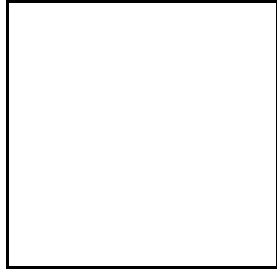
Thanks,

Dan McGonagle



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From: McGonagle, Dan
Sent: Monday, June 6, 2022 4:43 PM
To: Andrew S. Bruns <abruns@keker.com>; anant.saraswat@wolfgreenfield.com; Singular <Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com; matthiaskamber@paulhastings.com
Subject: RE: Singular v. Google (-1251)

Andy,

I am following up on this communication from last week. Please let me know Google's position or provide availability for a meet and confer this week to discuss.

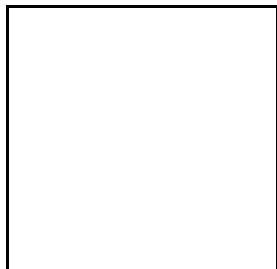
Thanks,

Dan McGonagle



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From: Andrew S. Bruns <abruns@keker.com>
Sent: Friday, June 3, 2022 3:37 PM
To: McGonagle, Dan <DMcGonagle@princelobel.com>; anant.saraswat@wolfgreenfield.com; Singular <Singular@princelobel.com>
Cc: kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com;

matthiaskamber@paulhastings.com

Subject: RE: Singular v. Google (-1251)

Dan,

Thank you for your email. We are looking into the issue and will get back to you next week with further information. Have a nice weekend.

Best,
Andy

Andrew S. Bruns

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Pronouns: he, him, his

From: McGonagle, Dan <dmcgonagle@princelobel.com>

Sent: Wednesday, June 1, 2022 5:12 AM

To: anant.saraswat@wolfgreenfield.com; singular@princelobel.com

Cc: kvp-singular@keker.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com; abhansali@kblfirm.com

Subject: Singular v. Google (-1251)

[EXTERNAL]

Counsel,

We write regarding your production following the hearing in this case on June 30, 2021 regarding ECF No. 228. At the hearing, you agreed to make a full production in response to Request for Production No. 115. Subsequent to that hearing, a production was made and you assured us that your production was complete with respect to the requests at issue.

Accordingly, we ask that you provide an index that correlates which documents produced in response to Request No. 115 correspond to the hyperlink or citation in the documents mentioned in this request. Your index should also include a list of documents which you were not able to locate following your investigation.

Thanks,
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